

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNI-CON FLOORS, INC.	)	
Plaintiff,	)	
	)	
v.	)	C.A. No.: 05-10463 NG
	)	
BRICKLAYERS & ALLIED CRAFTSMEN	)	
UNION, LOCAL 3 – EASTERN	)	
MASSACHUSETTS	)	
Defendant.	)	
_____	)	

MOTION FOR ENTRY OF ORDER OF JUDGMENT

NOW COMES Defendant, Bricklayers & Allied Craftsmen Union, Local 3- Eastern Massachusetts, and hereby moves the Court for entry of an Order of Judgment in favor of Defendant and against Plaintiff Uni-Con Floors, Inc., in the amount of \$184,463.10 in damages for lost wages and benefits, and \$7,639.90 in attorney's fees, for a total of \$192,103.00, pursuant to this Court's Judgment dated May 9, 2006 enforcing an Arbitration Board's January 25, 2005 Award in favor of Defendant against Plaintiff Uni-Con Floors, Inc.

In support of this Motion, Defendant submits the attached Declaration of Damages and Taxable Costs of Charles Raso, President/Secretary Treasurer of Defendant Bricklayers & Allied Craftsmen Union, Local 3- Eastern Massachusetts and the Affidavit of Jonathan M. Conti.

**WHEREFORE**, Defendant moves for an Order of Entry of Judgment in the amount of \$192,103.00 in favor of Defendant and against Plaintiff Uni-Con Floors, Inc.

Respectfully submitted,

For Defendant Bricklayers and  
Allied Craftsmen Local 3  
Eastern Massachusetts

By its Attorney

/s/ Jonathan M. Conti

Jonathan M. Conti, BBO#657163  
Feinberg, Campbell & Zack, P.C.  
177 Milk Street  
Boston, MA 02109  
(617) 338-1976

Dated this 16<sup>th</sup> day of January 2007.

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNI-CON FLOORS, INC.	)	
Plaintiff,	)	
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v.	)	C.A. No.: 05-10463 NG
	)	
BRICKLAYERS & ALLIED CRAFTSMEN	)	
UNION, LOCAL 3 – EASTERN	)	
MASSACHUSETTS	)	
Defendant.	)	
_____	)	

JUDGMENT

This action having come on for consideration of Defendant Bricklayers and Allied Craftsmen Union, Local 3- Eastern Massachusetts' Motion for an Order for Entry of Judgment before the Honorable Nancy Gertner, United States District Judge and, the Court, having granted Defendant's Motion for Summary Judgment to enforce an Arbitration Award against Plaintiff Uni-Con Floors, Inc, and in favor of Defendant, on May 9, 2006, hereby enters this Judgment for Defendant against Plaintiff for a total of \$192,103.00, which includes \$184,463.10 in wages and benefits and \$7,639.90 in attorney's fees and costs.

ORDERED, ADJUDGED AND DECREED that Defendant recover from Plaintiff the sum of \$192,103.00.

Dated:

\_\_\_\_\_  
Clerk, U.S. District Court